

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

ECHOTA C. WOLFCLAN, on behalf of  
himself and other similarly situated  
individuals,

Plaintiffs,

vs.

PIERCE COUNTY, et al.,

Defendants.

NO. 23-cv-5399-TSZ-SKV

DECLARATION OF FRANK A.  
CORNELIUS IN SUPPORT OF  
DEFENDANT PIERCE COUNTY'S  
MOTION FOR PROTECTIVE ORDER AND  
ENTRY OF PROTECTIVE ORDER

NOTE ON MOTION CALENDAR:  
AUGUST 30, 2024

I, FRANK A. CORNELIUS, declare that I am over the age of 18, have personal  
knowledge of the matters set forth below, and I am competent to testify to the matters stated  
herein.

1. I am counsel of record for Defendants in this matter.
2. Attached hereto as **Exhibit 1** is a true and accurate copy of Plaintiff's First Set of  
Interrogatories and Requests for Production of Documents to Defendants.
3. Attached hereto as **Exhibit 2** are true and accurate copies of email  
correspondence dated June 6, 2024, June 10, 2024, and June 11, 2024.
4. Attached hereto as **Exhibit 3** is a true and accurate copy of email correspondence

1 dated June 20, 2024.

2 5. Attached hereto as **Exhibit 4** is a true and accurate copy of Plaintiff's  
3 correspondence dated June 27, 2024.

4 6. Attached hereto as **Exhibit 5** is a true and accurate copy of Defendants'  
5 correspondence dated July 10, 2024.

6 7. Attached hereto as **Exhibit 6** is a true and accurate copy of the Court status  
7 conference transcript held July 11, 2024.

8 8. Attached hereto as **Exhibit 7** is a true and accurate copy of the most recent  
9 Answers/Supplements to Plaintiff's First Interrogatories and Requests for Production.

10 9. Attached hereto as **Exhibit 8** is a true and accurate copy of Defendants'  
11 correspondence dated July 17, 2024.

12 10. Attached hereto as **Exhibit 9** is a true and accurate copy of Plaintiff's  
13 correspondence dated July 29, 2024.

14 11. Attached hereto as **Exhibit 10** is a true and accurate copy of Defendants'  
15 correspondence dated July 31, 2024.

16 12. Attached hereto as **Exhibit 11** are true and accurate copies of email  
17 correspondence dated August 1- 2, 2024.

18 13. Attached hereto as **Exhibit 12** is a true and accurate copy of Defendants'  
19 correspondence dated August 12, 2024.

20 14. Attached hereto as **Exhibit 13** are true and accurate copies of email  
21 correspondence dated August 19, 2024.

22 15. Attached hereto as **Exhibit 14** are true and accurate copies of email  
23 correspondence dated August 15, 2024.

24 16. Attached as **Exhibit 15** is a true and accurate copy of Defendants' proposed

1 Protective Order regarding Request for Production No. 19 and Request for Production No. 20.

2 17. The Rule 26(f) meaningful meet and confer requirements were satisfied on June 10,  
3 2024, August 1, 2024, August 13, 2024, and with multiple additional follow-up email  
4 communications.

5 I declare under penalty of perjury of the laws of the State of Washington and the United  
6 States the foregoing to be true and accurate.

7 DATED this 22<sup>nd</sup> day of August, 2024, at Tacoma, Pierce County, Washington.

8  
9 s/FRANK A. CORNELIUS  
10 FRANK A. CORNELIUS  
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12 **CERTIFICATE OF SERVICE**

13 On August 22, 2024, I hereby certify that I electronically filed the foregoing  
14 DECLARATION OF FRANK A. CORNELIUS IN SUPPORT OF DEFENDANT PIERCE  
15 COUNTY'S MOTION FOR PROTECTIVE ORDER AND ENTRY OF PROTECTIVE ORDER  
with the Clerk of the Court using the CM/ECF system which will send notification of such filing  
to the following:

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